

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

PATRICIA COFFMAN,

Plaintiff,

-vs-

CASE NO.: 3:19-cv-00411

EQUIFAX INFORMATION SERVICES,
LLC and EXPERIAN INFORMATION
SOLUTIONS, INC.,

Defendant.

**JOINT MOTION TO EXTEND DISCOVERY AND DISPOSITIVE MOTION
DEADLINES**

COME NOW the parties, by and through their undersigned counsel and respectfully requests this Honorable Court extend the upcoming Discovery and Dispositive Motion deadlines in this case by thirty (30) days and in support thereof state as follows:

On September 11, 2019 this Court issued the Initial Case Management Order [Doc. 32] setting The Discovery deadline for March 11, 2020 and the Dispositive Motion deadline for April 10, 2020.

The parties have been working to complete the discovery phase but need more time. The extension will not affect the trial dates or any other dates.

Currently Equifax's Corporate Representative is scheduled for a deposition March 19, 2020 in Atlanta, GA. Experian's Corporate Representative is scheduled March 31, 2020 in Dallas. Plaintiff's deposition is scheduled for April 1, 2020 in Nashville, TN. The parties do not anticipate any further depositions and will have concluded all discovery by April 10, 2020.

In order to ensure the Parties can adequately review the documents necessary to prosecute and defend the case, coordinate the remaining depositions, ensure time for their

respective experts to prepare reports, and brief their anticipated motions, the Parties respectfully request the Court alter the current deadlines as follows:

Event	Current Deadline	Proposed New Deadline
Discovery Deadline	March 11, 2020	April 10, 2020
Dispositive Motion Deadline	April 10, 2020	May 11, 2020

If this Court deems that trial date (currently set for August 18) should be pushed back by 30 days, the Parties have no objection. Federal Rule of Civil Procedure 16(b) provides that a scheduling order may be modified “for good cause and with the judge’s consent.” *See* Fed. R. Civ. P. 16(b)(4). The parties have been diligent in pursuing discovery as set forth above. However, despite this diligence, and due to complicating factors, the Parties will not be able to complete discovery and otherwise prepare the case for motion practice and trial within the current schedule.

This motion is not meant for the purposes of delay but for the efficient administration or fairness and justice. The parties believe this extension will facilitate the orderly progress of the case.

Neither party will be prejudiced by the Court granting the relief sought in this Motion.

WHEREFORE, the Parties respectfully request the Court grant the Parties’ Motion and extend the current deadlines. A proposed Order is attached.

/s/ Frank H. Kerney, III

FRANK H. KERNEY, III, ESQUIRE
Florida Bar #: 88672
MORGAN & MORGAN, TAMPA, P.A.
201 N. Franklin St., Suite 700
Tampa, FL 33602
Telephone: (813) 223-5505
Email: fkerney@forthepeople.com
Secondary: jkneeland@forthepeople.com
Attorney for Plaintiff

/s/ John C. Willet

John D. Willet
Evans Petree PC
1715 Aaron Brenner Drive, Suite 800
Memphis, TN 38120
Tel: 901-525-6781
Fax: 901-374-7548
Email: jwillet@evanspetree.com
Attorney for Equifax Information Services LLC

/s/ Aditya Shrivastava

Aditya Shrivastava, Esq.
Erin Palmer Polly
Jones Day
1420 Peachtree Street NE,
Atlanta GA30309
Telephone: (404) 581-3939
ashrivastava@jonesday.com
*Counsel for Experian Information
Solutions, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 14, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record and that I sent a true and correct copy of the foregoing to the following counsel of record via email:

John D. Willet, Esq.

JWillet@EvansPetree.com
EVANS PETREE, PC
Counsel for Equifax Information Services

Erin P. Polly, Esq.

Erin.Polly@ButlerSnow.com
BUTLER SNOW, LLP
Counsel for Experian Information Solutions

Aditya Shrivastava, Esq.

ashrivastava@jonesday.com
Jones Day

s/ Frank H. Kerney, III

Frank H. Kerney, III